
From: Henning, Alan
To: Wu, Jennifer
Sent: 8/28/2014 7:14:51 PM
Subject: RE: Draft Forestry - Riparian Rationale

Thanks Jenny. I will take a look at your comments tomorrow.. BTW, I did talk with Josh regarding landslides. He was really irritated that OFIC would even ask this question. Josh said there is not a single study that provides that direct link. It is through a chain of evidence that the connection is made. He provided me a good construct to use to respond to the issue of the "landslide -water quality standards violation" connection. He also said he is actually working on this same issue with the landslides literature review. I will be working on this language tomorrow. I thought Peter did a great job with providing clarity on the notifications. It puts more life into the issue. And thanks for all of your help on this.

Alan

From: Wu, Jennifer
Sent: Thursday, August 28, 2014 2:57 PM
To: Henning, Alan; Peterson, Erik; Kubo, Teresa; Leinenbach, Peter
Cc: allison.castellan@noaa.gov; Woodruff, Leigh; Carlin, Jayne
Subject: RE: Draft Forestry - Riparian Rationale

Hi Alan, I looked over and thought it was a pretty good write-up. I didn't get a chance to look over the science part- probably what you wanted help on the most- but the logic seems good. I added info on the upcoming Board of Forestry meeting in the rationale (we'll probably need to delete or update before Federal Register notice), but thought you'd be interested that ODF is recommending to the Board to move forward with the Rule. Check the link and scroll down to September 3, 2014 Pre-Meeting Materials.

http://www.oregon.gov/odf/Pages/board/board_info/2014_Meeting_Schedule.aspx

From: Henning, Alan
Sent: Saturday, August 23, 2014 12:49 PM
To: Peterson, Erik; Wu, Jennifer; Kubo, Teresa; Leinenbach, Peter
Cc: allison.castellan@noaa.gov; Woodruff, Leigh; Carlin, Jayne
Subject: Draft Forestry - Riparian Rationale

Hey guys,

If possible, I would love to get your review/input on the attached document. It isn't long (only three pages), but it is critical that what we say here is solid and accurate. The attached is the draft rationale (that Allison put together - my minor edits are in red) which provides the basis for our CZARA decision on the Forestry-Riparian issue. It would be great if you all would double check the statements made on the science and flesh out some of the issues with additional science where needed (see the yellow comments). Our goal is to present this final rationale to the NOAA/EPA management team on September 3rd. Assuming their approval of the direction presented in the rationale, I see this as one of the cornerstone decision issues on the State's CNPCP. I know this is an unreasonable request especially since this is short notice and this is a week leading into a holiday weekend, but it would be great if you could provide me your input by the COB on Wednesday.

In addition, I am currently putting together the draft rationale for the landslides issue. We did present an options paper to the management team on this issue. The management team generally supported the staff's recommendation to disapprove based on the lack of management measures for protecting water quality from potentially high risk landslides. The management team identified areas where they wanted additional feedback i.e., how other state programs address landslides, and recommendations for specific actions we could suggest to the state to address this issue. Our goal is to present the final rationale to the management team on the 3rd as well. As soon as I get the rationale drafted, I will share it with you.

And the roads issue - Well, an options paper needs to be presented to management and a rationale paper needs to be finalized on this issue. Using the drafts developed thus far by the roads team, I'll be working to get the options paper and the rationale completed for the management team ASAP. These will be shared with you all as well when they are ready to go.

Of the issues presented in our proposed decision to disapprove the State's CNPCP, these forestry issues are the ones where the CZARA tech team agrees there is solid information/data to move forward with our final CZARA decision. If management agrees on these issues, and the management team and legal teams agree our rationale documents are solid, we will likely see the management team begin briefing upper-upper management on this decision. While the elevation process takes place, staff will be developing the responses to comments document for these issues.

Feel free to give me a call if you have any questions.

Alan
541-687-7360